

TRULINCS 16950050 - AHMED, SHAHZAD - Unit: ALM-D-B

FROM: 16950050
 TO:
 SUBJECT: Supplement Motion
 DATE: 08/24/2022 12:32:42 PM

United States

v.

17-CR-00575 (KMK)

Shahzad Ahmed

Pro Se

Compassionate Release Supplement Motion

Honorable Judge Karas:

As the insidious effects of COVID-19 reek havoc throughout the world. Pennsylvania where defendant is housed, once again is experiencing COVID-19 out break. The sickness throughout the prison is intemperate and unbridled. Staff and Inmates analogously are suffering from Omicron BA-5 infection. It has come to a point where no-one is conscientious anymore. Only ones who are scrupulous and aghast of this deadly disease are Inmates with underlying and pre-existing conditions and debilitated immune system.

Defendant brought to this courts attention in the last supplement motion, that after the vaccine defendant suffered adverse reaction and side effects which resulted in Auto immune disease, ulcers in the mouth and loss of tissue in the mouth (tissue is being eaten away slowly).

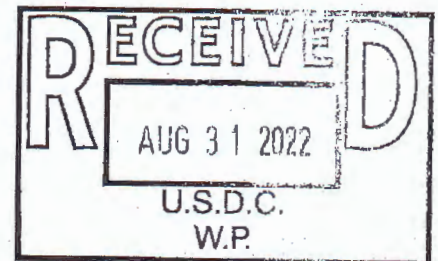
Dentist here at Allenwood prescribed a medication, to slow the spread but to no avail and Physician Assistant Mr. Hemphill told the defendant "...that they can't figure out the reaction and there is no treatment for this here in the prison system.."

Hence, the defendant's condition has worsen since the last time he wrote to this court. What's more after contracting the virus even though the defendant was fully vaccinated, he experienced extreme breathing problems and coughing for 3 weeks and reluctantly he took the booster shot knowing that the side effects would increase but defendant was despearte becuase of extermne sickness which came with COVID-19.

Sure enough, after the booster shot the side effects increased and the ulcers and tissue damage is far greater than before. Further, the perturbation and stress level has increased astronomically and defendant is medically exempt from any further vaccines and booster shots according to the medical staff here at Allenwood.

Furthermore, since the contraction defendant 's breathing problems have worsen, and sense of taste and smell are at 50%. It is a well known fact that Organ damage is a normal occurrence in people with debilitated immune system, but there is no way to check that because in the prison system bare minimum health care is provided.

Hence, the defendant is a COVID-long hauler like 5 million other Americans who are suffering from long term COVID-19 effects, and no one knows what the final out come is going to be and on top of being a COVID-19 long hauler, defendant has



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suffered extreme side effects with the vaccine and booster shot. According to University of Houston Methodist Hospital Research, in Long Covid cells are not able to breakdown oxygen and it causes shortness of breath and loss of Oxygen and heart is not able to pump enough blood.(NPR Radio reporting on 8-19-2022 at (9.00am)).

Furthermore, conditions at prison system can never follow the CDC guidelines and most of the staff members at Allenwood do not believe in vaccination and they are not vaccinated.

As the defendant wrote to this court, that defendant understands at the beginning of his life it was incredulity, which now has turned into credence that wrong will always lead a person astray.

Few recent cases are instructive in United States v. James Edward Howze, 2020.U.S.Dist LEXIS 40973 Case No.8:03-Cr-226 -CEH-TGW. (defendant was granted the compassionate release even though he had 360 month sentence and was charged with manufacturing Meth and felonious firearm possession).

See also.; United States v. Thomas Kohler 2022. U.S.Dist.LEXIS 45916 Case No:8:15-CR-425-CEH-CPT. (Compassionate release granted, defendant's release date was Dec-6-2026. He was serving a sentence of 151 months for distributing meth and suffered from pre-diabetes and PTSD.

See also.; United States v. Darrel Williams 2022.U.S.Dist.LEXIS 109343 No.2:02-CR-00012-JMS {June,21,2022}.

(Compassionate release granted to the defendant who was serving 310 month sentence for conspiracy to distribute in excess of 500 grams of cocaine. A few months later after his sentence, he was found in possession of heroin, while housed at USP Terre Haute. He was prosecuted and convicted and received additional 41 months to be served consecutively and while he was being prosecuted he was involved in a major fights with other inmates and received 20 more years in state, for possessing a weapon and aggravated assaults and battery to run consecutively with the federal sentence).

See also; United States v. Ciprano 2022. U.S.Dist.LEXIS 29390 CR-92-350 SEC"L" {Feb.18,2022} (Compassionate Release granted even though defendant had 2 prior convictions and his third conviction led to a life sentence).

Your Honor, these cases are very helpful and are clearly in defendant's favor. As stated before, in the letter that defendant is not the same young and foolish man he once was.

Hence, the defendant is left with contrition, once self assurance has turned into self-deprecation and the arrogance which most of the people who commit crimes is replaced by retiringness.

To sum it all up, defendant abjures his previous mistakes.

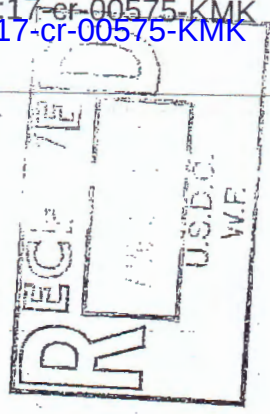
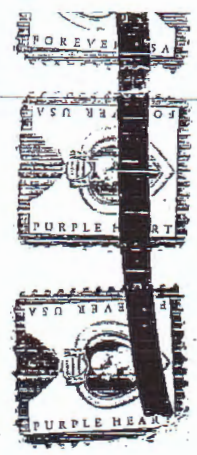
Defendant remains auspicious that this court's prognostication would be relief.

Sincerely,



Shahzad Ahmed #16950-050
FCI Allenwood Medium, PA

8/25/2022



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SDNY

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Supplemental application for compassionate release, under 18 U.S.C. Section 3582, is denied. As noted in denying the first motion (and the subsequent motion for reconsideration), Mr. Ahmed is vaccinated and benefits from natural immunity from previously contracting (and surviving) Covid. While there may be side effects from the vaccine, that does not make for an extraordinary or compelling case for early release. Moreover, Mr. Ahmed continues to ignore the Court's previous finding that consideration of the Section 3553(a) factors argues strongly against early release. Mr. Ahmed has a very problematic criminal history and his conduct here was quite serious. That is why the Court imposed a Guidelines sentence of 135 months' imprisonment, much of which Mr. Ahmed is yet to serve. Early release would undermine general and specific deterrence and respect for the law.

So Ordered.

[Signature]

10/19/22

ALLEY WOOD FEDERAL CORRECTIONAL INSTITUTION
WHITE DEER, PA 17807-2309

DATE

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